

Before the

FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Review of Part 15 and other Parts ET Docket No. 01-278 of the Commission's  
Rules

RM-9375

RM-10051

To: The Commission

COMMENTS OF JOHN PAUL DOOLEY  
IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

The NPRM is a proceeding that is broader than just the SAVI issue. The purpose of the docket proceeding is to review and update certain rules governing unlicensed RF emitting devices. The remainder of the issues in the NPRM are not generally a concern to Amateur Radio. The NPRM did not address any of the concerns in the ARRL comments on the SAVI Petition, and those can be restated. The most important argument, however, is that interference will inevitably result to Amateur stations from these mobile devices at unpredictable locations, transmitting at 110,000 uV/m immediately adjacent to the 432 MHz weak-signal band, in a band used extensively by Amateurs for control links for repeaters and other functions.

The other main point is that even if this high-power system is to be allowed to operate with high duty cycles (completely contrary to the basic reason for allowing such high power for periodic radiator devices in the first place) there is no reason whatsoever why 433 MHz should have been chosen for this application, and it should not be allowed between 420 and 450 MHz.

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